

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA,  
Plaintiff**

**VS.**

**Real Property Located and Situated at  
1019 Fairway, Kyle, Hays County,  
Texas 78640  
Defendant**

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**5:12-CV-00822-OLG**

**ORIGINAL ANSWER OF HAYS CONSOLIDATED  
INDEPENDENT SCHOOL DISTRICT, ET AL.**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Hays Consolidated Independent School District, Plum Creek Conservation District, and Plum Creek Groundwater District (“Taxing Authorities”), and files its Original Answer to United States of America’s Verified Complaint for Forfeiture (“Complaint”) and would respectfully show the Court the following:

1. Taxing Authorities admit the allegations in part I of the Complaint.
2. Taxing Authorities are not required to admit or deny the allegations in part II of the Complaint because it is a recitation of procedural authority and therefore does not require a response.
3. Taxing Authorities admit the Court has jurisdiction over this matter as alleged in part III of the Complaint.
4. Taxing Authorities are without the requisite knowledge to admit or deny the allegations in part IV of the Complaint, therefore they are denied.

5. Taxing Authorities are not required to admit or deny the allegations in part V of the Complaint because they are statements of the Plaintiff's intentions and not facts.

WHEREFORE, PREMISES CONSIDERED, Taxing Authorities pray that the Court

- a. recognize the continued existence of and validity of the tax liens securing payment of the taxes, penalties and interest assessed by Taxing Authorities on the subject property;
- b. order that taxes, penalties and interest owing to the Taxing Authorities be paid from the proceeds of the sale after the expenses of preservation of the sale and prior to distribution to any other claimant; and
- c. for all further relief to which Taxing Authorities may be entitled.

Respectfully Submitted,

LORI GRUVER  
ATTORNEY FOR TAXING AUTHORITIES

By: /s/ Lori Gruver  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed electronically and is to be served by electronic transmission to all parties on the court's electronic mailing matrix on September 25, 2012

/s/ Lori Gruver \_\_\_\_\_  
LORI GRUVER